

Sheehan & Associates, P.C.

505 Northern Boulevard, Suite 311, Great Neck, NY 11021  
tel. 516.303.0552  
fax 516.234.7800  
spencer@spencersheehan.com

September 18, 2019

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: 1:19-cv-03209-RJD-ST  
Garadi et al v. Mars Wrigley Confectionery US, LLC

Dear Magistrate Judge Tiscione:

This office represents the plaintiff in this action. In accordance with your Honor's Individual Practice Rules, the letter is made no later than 48 hours prior to the Initial Conference of September 20, 2019, 12:00 PM and requests an adjournment of the Initial Conference and that the discovery matters specified in Fed. R. Civ. P. 26(f) as part of the required discovery plan be stayed until defendant has responded to the Complaint.

The Court's Scheduling Order of July 21, 2019 (Dkt. 5) set an initial conference before the Court for September 20, 2019, at 12:00 p.m., and ordered the parties to confer on and prepare a proposed discovery plan.

There have been no previous requests for adjournment or extension and defendant consents to this request. This adjournment and extension is requested because (1) defendant's date for responding to the complaint is October 21, 2019, (2) the parties have initiated discussions aimed at a possible resolution of this matter and (3) a discovery plan will be more efficiently formulated following the resolution of defendant's anticipated motion to dismiss the Complaint under Rules 12(b)(1) and 12(b)(6). An alternate date for the initial conference is October 24, 2019 at 12:00 PM.

I appreciate the Court's consideration of this request.

Respectfully submitted,

/s/ Spencer Sheehan  
Spencer Sheehan

Certificate of Service

I certify that on September 18, 2019, I served the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Plaintiff's Counsel</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan  
Spencer Sheehan